

### **REMARKS**

Claims 1-11 are pending in the application. Claims 1 and 10 have been amended herein. Favorable reconsideration of the application, as amended, is respectfully requested.

#### ***I. ALLOWABLE SUBJECT MATTER***

Applicants acknowledge with appreciation the noted allowability of claims 3 and 6-11. These claims are in condition for allowance subject to being amended to independent form and/or to overcome any objections.

#### ***II. OBJECTION TO THE DRAWINGS***

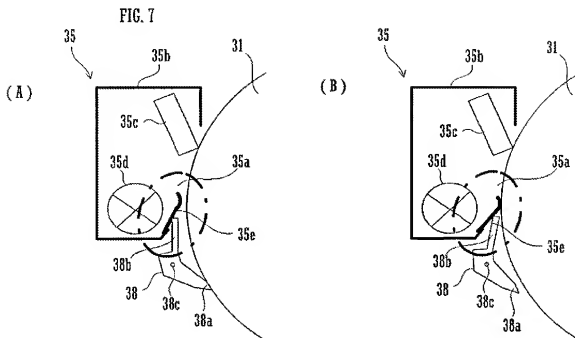
In response to the drawing objection, Fig. 1 has been amended to remove the reference characters "24a" and "24b" with respect to the manual tray 22. Applicants submit herewith a replacement sheet including such amendments.

#### ***III. CLAIM OBJECTIONS***

Claims 1, 6 and 10 stand objected to based on the informalities identified by the Examiner on pages 2-3 of the Office Action.

Regarding claims 1 and 10 respectively, the Examiner indicates that "the free length" and "the separating member" lack antecedent basis. In response, applicants have amended claim 1 to refer to "a free length" and thereby possess proper antecedent basis. Similarly, applicants have amended claim 10 to refer to "a separating member."

Regarding claim 6, the Examiner contends that the last three lines are unclear since the vibrating portion of the paper peeling claw can only vibrate the toner catching sheet when it is separated from the image bearing member. Hence, the Examiner indicates that it is unclear that vibration is provided when the paper peeling portion abuts the image bearing member.



Applicants respectfully submit that claim 6 is clear in reciting that the vibrating portion causes the toner catching sheet to vibrate by touching the toner catching sheet when the paper peeling portion (i) abuts or (ii) separates from the image bearing member. As is illustrated in Figs. 7(A) and 7(B) (reproduced above), the vibration portion 38b causes the toner catching sheet 35e to vibrate when the paper peeling portion 38a transitions back and forth between abutting the image bearing member 31 (Fig. 7(A)) and fully separating from the image bearing member 31 (Fig. 7(B)). One may imagine how as the paper peeling portion 38a transitions back and forth between the positions represented in Figs. 7(A) and 7(B), the toner catching sheet 35e will correspondingly transition back and forth between the positions represented in Figs. 7(A) and 7(B). (See, e.g., [0058]).

Thus, applicants respectfully submit that claim 6 is in fact descriptive of the invention even with the inclusion of language "abuts or". Applicants respectfully request withdrawal of the objection..

**IV. REJECTION OF CLAIMS 1-2 AND 4-5 UNDER 35 USC §102(b)/103(a)**

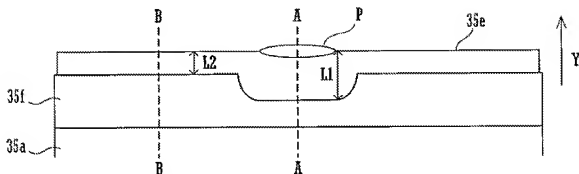
Claims 1-2 and 4 stand rejected under 35 USC §102(b) based on *Koiso*.  
Claim 5 stands rejected under 35 U.S.C. §103(a) based on *Koiso* in view of *JP '462*.

Referring to claim 1, the toner catching sheet has a free length that is “determined by an amount of paper dust buildup on the outer circumferential portion of the image bearing member in the lengthwise direction.” The Examiner submits that *Koiso* teaches that the toner guide member 176 has a free length determined by an amount of paper dust buildup on the outer circumferential portion of the image bearing member in a lengthwise direction. The Examiner thus concludes that the toner guide member 176 will have different lengths depending on the amount of paper dust against it. (O.A., p. 4).

Applicants respectfully submit that the toner guide member 176 in *Koiso* does not possess a free length which is a function of an amount of paper dust buildup on the outer circumferential portion of the image bearing member in the lengthwise direction as claimed. As is discussed in the present application, locations where there is a large amount of paper dust buildup on the outer circumferential portion of the image bearing member are locations opposite the central section of the paper in the sub scanning direction. ([0047]).

[Intentionally Left Blank]

FIG. 3



Consequently, as illustrated in Fig. 3 of the present application (reproduced above), the free length of the toner catching sheet 35 is determined by an amount of paper dust buildup on the outer circumferential portion of the image bearing member in the lengthwise direction. For example, in Fig. 3 the free length in the middle corresponding to the central portion of the paper has a free length of  $L1$ , whereas the free length at the ends is  $L2$  which is shorter than  $L1$ .

Applicants note that the free length (e.g.,  $L1$ ,  $L2$ ) of the toner catching sheet is a physical property of the toner catching sheet. The free lengths of the toner catching sheet are designed in the production stage based on the knowledge of where the paper dust buildup at the outer circumferential portion of the image bearing member in the lengthwise direction. As noted above, buildup is typically in the central portion.

Applicants respectfully submit that *Koiso* does not illustrate or describe any type of variation in the free length of the toner guide member 176 between the affixed portion and the abutting portion. Therefore, the length can only be construed as constant between first and second end portions along the lengthwise direction.

Stated differently, the length L of the toner guide member 176 in *Koiso* is uniform along the lengthwise direction of the image bearing member. As a result, there can be no determination of the free length by an amount of paper dust buildup as recited in claim 1.

The Examiner argues that since the toner guide member 176 in *Koiso* is made of a resin material (easily deformable), the toner guide member 176 will have different lengths depending on the amount of paper dust against it. However, even with the toner guide member 176 in *Koiso* being made out of resin, and therefore easily deformable, this does not mean the sheet takes on different lengths. The amount of paper dust buildup in the device in *Koiso* will not change the free length of the toner guide member 176 in *Koiso* since the free length is a fixed physical property. While the toner guide member 176 may be considered a flexible flap and flex during operation, the free length of the flap will remain the same.

Similar comments apply with respect to claim 2. Claim 2 specifically recites how the first free length (e.g., L1) corresponding to a location at which there is a large amount of paper dust buildup is longer than a second free length (e.g., L2) corresponding to a location at which there is a small amount of paper dust buildup on the outer circumferential portion of the image bearing member. Claim 2 specifically calls for the first free length to be longer than the second free length. *Koiso* does not teach or suggest the toner guide member 176 possessing a first free length longer than a second free length as recited in claim 2. Again, while the toner guide member 176 may be deformable, there is no teaching or suggestion that the toner guide member 176 deforms in any way as to have physically different lengths as claimed.

For at least the above reasons, applicants respectfully submit that *Koiso* neither teaches nor renders obvious the claimed invention as recited in claims 1-2 and 4-5. Moreover, *JP '462* does not make up for the deficiencies in *Koiso*. Applicants therefore respectfully request withdrawal of the rejections.

**V. CONCLUSION**

Accordingly, all claims 1-11 are believed to be allowable and the application is believed to be in condition for allowance. A prompt action to such end is earnestly solicited.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

Should a petition for an extension of time be necessary for the timely reply to the outstanding Office Action (or if such a petition has been made and an additional extension is necessary), petition is hereby made and the Commissioner is authorized to charge any fees (including additional claim fees) to Deposit Account No. 18-0988.

Respectfully submitted,

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Reg. No. 34,243

DATE: August 20, 2008

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